

### **REMARKS**

Reconsideration and allowance are respectfully requested. Claims 3 and 16 have been amended. Claims 1-41 remain pending.

Claim 16 stands rejected under 35 U.S.C. 112, second paragraph as being indefinite. This claim has been carefully reviewed and revised to be in full compliance with 35 U.S.C. 112. Therefore, the rejection should be withdrawn.

Claims 1, 2, 5-7, 9, 11-14, 20-23, 27-29, 32-34, 36 and 38-40 stand rejected under 35 U.S.C. 102(e) as being anticipated by Aravamudan et al. This rejection is respectfully traversed. Each of independent claims 1, 12, 20, 28 and 39 require that an HTML page or document is generated having instructions to notify a second party of a new application session (claims 1, 20, 28 and 39) or to initiate a new application session for the second party (claim 12). As discussed at page 15, lines 21 to page 16, line 10 of the present specification, the claimed invention can be implemented in an instant messaging scheme. For example, if the second party is available, (currently in a session with an application server) the application server serving the first party generates a HTML page having instructions to notify the second party of a new application session so as to present a message from the first party to the second party.

Nowhere do Aravamudan et al. teach or suggest generating an HTML page as claimed. In fact, the text of the Aravamudan et al. fails to even contain a reference to HTML. In order to anticipate, a reference must teach each and every claim feature. Aravamudan et al. merely teach at column 9, lines 10-15 that when the user is online, an instant message is conveyed to the user to notify the user that the CSP has received an important event. Initiating an instant message is not a teaching of generating an HTML page as claimed. Furthermore, with regard to claims 2 and 29, nowhere does Aravamudan et al. teach an HTML page having a URL causing a browser to request interruption of the present application session of a second party. Therefore, the rejection is improper and should be withdrawn.

Claims 3, 4, 17, 19, 30, and 31 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Aravamudan et al. in view of Chang et al. These claims depend from the independent claims and are considered to be allowable for the reasons advanced

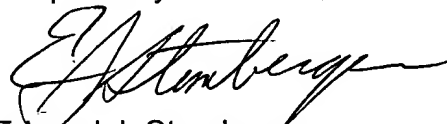
above, and for the additional reason that the added subject matter of claims 3, 4, 17, 19, 30 and 31 is not taught nor suggested by Chang et al.

Claims 8, 10, 15, 16, 25, 26, 35, and 37 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Aravamudan et al. in view of Srivastava et al. These claims depend from the independent claims and are considered to be allowable for the reasons advanced above, and for the additional reason that the added subject matter of claims 8, 10, 15, 16, 25, 26, 35, and 37 is not taught nor suggested by Srivastava et al.

Claims 18 and 24 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Aravamudan et al. These claims depend from the independent claims and are considered to be allowable for the reasons advanced above.

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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